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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Oralia Garcia Esparza,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

} Case No. 1:21-cv-00991-SKO
} STIPULATION AND ORDER FOR
} EXTENSION OF TIME
(Doc. 13)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from January 7, 2022 to March 8, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this request. Counsel for the Plaintiff is currently in Houston, Texas due to a

family emergency involving Counsel's father who is gravely ill with Leukemia. (See Declaration by Dolly M. Trompeter). Counsel for the Plaintiff is a principal caregiver. Additionally, Counsel has limited access to her computer and will require additional time to brief this matter upon her return to California.

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: January 5, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: January 5, 2022

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: *s/ Patrick Snyder
Patrick Snyder
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on January 5, 2022)

ORDER

Based upon the foregoing stipulation of the parties (Doc. 13), and for good cause appearing (Fed. R. Civ. P. 16(b)(4)),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including March 8, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 11) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **January 7, 2022**

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE